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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 LARRY SENG IN,  
15 Defendant.  
16

Case No. 2:20-cr-00095-JAD-BNW

**STIPULATION TO CONTINUE  
PRETRIAL MOTION DEADLINES**  
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Melanee Smith,  
18 Assistant United States Attorney, counsel for the United States of America, and Rene L.  
19 Valladares, Federal Public Defender, and Katherine Tanaka, Assistant Federal Public Defender,  
20 counsel for Larry Seng In, that the previously ordered deadline for filing of pretrial motions be  
21 vacated and that the parties herein shall have to and including May 11, 2021, within which to  
22 file the Defendant's pretrial motions currently due April 27, 2021.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
24 shall have to and including May 25, 2021, to file any and all responsive pleadings, currently  
25 due May 11, 2021.  
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including June 1, 2021, to file any and all replies to dispositive motions,  
3 currently due May 18, 2021.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to meet and discuss the  
6 government's proposed resolution with her client; and to file a pretrial motion should her client  
7 reject the government's proposed resolution.

8 2. The defendant is not incarcerated and does not object to the continuance.

9 3. The parties agree to the continuance.

10 4. The additional time requested herein is not sought for purposes of delay, but  
11 merely to allow counsel for defendant sufficient time within which to discuss the proposed  
12 resolution with her client.

13 5. Additionally, denial of this request for continuance could result in a miscarriage  
14 of justice.

15 This is the first stipulation to continue filed herein.

16 DATED this 27<sup>th</sup> day of April 2021.

17  
18 RENE L. VALLADARES  
19 Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

20 By Katherine Tanaka

By /s/ Melanee Smith

21 KATHERINE TANAKA  
Assistant Federal Public Defender

MELANEE SMITH  
Assistant United States Attorney

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**ORDER**

IT IS THEREFORE ORDERED that the parties herein shall have to and including May 11, 2021, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including May 25, 2021, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including June 1, 2021, to file any and all replies to dispositive motions.

DATED this 30th day of April 2021.



U.S. Magistrate Judge